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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JONATHAN
FRANCIS IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PARTIES' JOINT SUBMISSION
REGARDING SHORT DESCRIPTIONS
FOR ALLEGED TRADE SECRETS**

1 I, Jonathan Francis, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 I make this declaration in support of Administrative Motion to File Under Seal Parties'
7 Joint Submission Regarding Short Descriptions for Alleged Trade Secrets ("Administrative
8 Motion"), filed concurrently herewith. The Administrative Motion seeks an order sealing the
9 following materials, also filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Parties' Joint Submission Regarding Short Descriptions for Alleged Trade Secrets	Highlighted portions	Waymo (green highlights)
Exhibit A to Parties' Joint Submission Regarding Short Descriptions for Alleged Trade Secrets	Entire Document	Waymo

16 2. Specifically, the green highlighted portions of the Parties' Joint Submission Regarding
17 Short Descriptions for Alleged Trade Secrets and the entirety of Exhibit A thereto, contain or refer to
18 Waymo's trade secrets, which Waymo seeks to seal. The information Waymo seeks to seal includes
19 the confidential design and functionality of Waymo's proprietary autonomous vehicle system,
20 including its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets
21 are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's
22 business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors
23 access to descriptions of the functionality or features of Waymo's autonomous vehicle system. If such
24 information were made public, I understand that Waymo's competitive standing would be
25 significantly harmed.

26 3. Waymo's request to seal is narrowly tailored to those portions of the Parties' Joint
27 Submission Regarding Short Descriptions for Alleged Trade Secrets and Exhibit A thereto that merit
28 sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on February 3, 2018.

4
5 By /s/ Jonathan Francis

6 Jonathan Francis
7 Attorneys for WAYMO LLC

8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Jonathan Francis.

11 /s/ Charles K. Verhoeven

12 Charles K. Verhoeven
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